

July 28, 2023

VIA ECF

Hon. Taryn A. Merkl  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Trooper 1 v. New York State Police, et al.*, No. 22-cv-00893 (LDH)(TAM)**

Dear Judge Merkl:

We represent non-party Lindsey Boylan in the above-referenced matter and write regarding the briefing schedule on Ms. Boylan's pending motion to quash.

In *Andrew M. Cuomo v. Lindsey Boylan*, 23-mc-01587 (LDH)(TAM) (the "Miscellaneous Matter"), at the request of Defendant Andrew Cuomo, we consented to a one-week extension, from July 12, 2023 to July 19, 2023, of Defendant Cuomo's time to file his reply in further support of his motion to compel and opposition to Ms. Boylan's cross-motion to quash. *See* ECF No. 20. In turn, Defendant Cuomo agreed that Ms. Boylan's reply in support of her cross-motion to quash in the Miscellaneous Matter would be extended from July 24, 2023 to August 9, 2023 (*see id.*), and that Ms. Boylan's reply in support of her motion to quash in the above-referenced matter would similarly be extended from August 2, 2023 to August 9, 2023.

While a request to extend the briefing schedule was filed in the Miscellaneous Matter, which remains pending before the Court, a similar request was not filed here. Accordingly, in light of the prior extension given to Defendant Cuomo and the parties' agreement, Ms. Boylan respectfully requests that the deadline for Ms. Boylan's reply in support of her motion to quash in the above-referenced matter also be extended until August 9, 2023. Defendant Cuomo, through his counsel, has consented to this request for an extension.

We therefore respectfully request that the Court grant Ms. Boylan an extension until August 9, 2023 in both *Andrew M. Cuomo v. Lindsey Boylan*, No. 23-mc-01587, as previously requested [ECF No. 20], and *Trooper 1 v. New York State Police, et al.*, No. 22-cv-00893 with respect to this motion.

The Honorable Taryn A. Merkl  
July 28, 2023

This is Ms. Boylan's first request for such an extension in the above-referenced matter and does not affect any other scheduled dates. We appreciate Your Honor's consideration of this request.

Sincerely,

/s/ E. Danya Perry

E. Danya Perry

*Attorney for Respondent Lindsey Boylan*